

Mao Declaration

Exhibit 1

From: [Flórez, Argemira](#)
To: [Ryan Sila](#); [Santacana, Eduardo E.](#)
Cc: [FIREBASE-WFGE](#); WAAGOOOGLETEAM@lists.susmangodfrey.com
Subject: RE: Rodriguez v. Google: Notice Plan
Date: Friday, April 26, 2024 2:51:26 AM

EXTERNAL Email

Counsel,

To your first question – No. It is Google’s position that in circumstances where Google must send notifications to Google Workspace for Education suite accounts, the general practice is to do so through the administrator.

We are still working to understand any technical and/or other limitations that may exist when sending notifications to end users for the relevant account types. We will provide a response to your remaining questions once we have a clearer understanding of what those might be.

Best,
Argemira

Argemira Flórez
Willkie Farr & Gallagher LLP
333 Bush St | San Francisco, CA 94104
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aflorez@willkie.com | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

NEW | Please note our new office address, effective December 15, 2023

From: Ryan Sila <RSila@susmangodfrey.com>
Sent: Tuesday, April 23, 2024 8:07 PM
To: Flórez, Argemira <AFlorez@willkie.com>; Santacana, Eduardo E. <ESantacana@willkie.com>
Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>; WAAGOOOGLETEAM@lists.susmangodfrey.com
Subject: RE: Rodriguez v. Google: Notice Plan

*** **EXTERNAL EMAIL** ***

Counsel — A few follow-up questions on this:

1. Is Google’s position that notice cannot be emailed directly to *any* type of Google Workspace for Education suite accounts, including those held by adults (e.g., teachers, professors, college students)?
2. Is Google’s position that notice cannot be emailed directly to Unicorn accounts either, and must be emailed to their parents?
3. Can you please explain why notice cannot be emailed directly to the end user for the relevant account types?
4. If notice were sent only to the administrator, how does Google imagine that the end-user class members would receive email notice?

Thanks,
Ryan

From: Flórez, Argemira <AFlorez@willkie.com>
Sent: Monday, April 22, 2024 3:02 PM
To: Ryan Sila <RSila@susmangodfrey.com>; Santacana, Eduardo E. <ESantacana@willkie.com>
Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>; WAAGOOGLTEAM@lists.susmangodfrey.com
Subject: RE: Rodriguez v. Google: Notice Plan

EXTERNAL Email

It is Google's position that the notice must be directed to the enterprise administrator, rather than the end user.

Thank you,
Argemira

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NEW | Please note our new office address, effective December 15, 2023

From: Ryan Sila <RSila@susmangodfrey.com>
Sent: Monday, April 22, 2024 2:56 PM
To: Ryan Sila <RSila@susmangodfrey.com>; Flórez, Argemira <AFlorez@willkie.com>; Santacana, Eduardo E. <ESantacana@willkie.com>
Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>; WAAGOOGLTEAM@lists.susmangodfrey.com
Subject: RE: Rodriguez v. Google: Notice Plan

***** EXTERNAL EMAIL *****

To clarify — Is it Google's position that *Google* (as opposed to Epiq) must send these notices? Or is Google's position only that the notice must be directed to the enterprise administrator, rather than the user?

From: owner-waagoogleteam@lists.susmangodfrey.com <owner-waagoogleteam@lists.susmangodfrey.com> **On Behalf Of** Ryan Sila
Sent: Monday, April 22, 2024 2:44 PM
To: Flórez, Argemira <AFlorez@willkie.com>; Santacana, Eduardo E. <ESantacana@willkie.com>
Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>; WAAGOOGLTEAM@lists.susmangodfrey.com
Subject: RE: Rodriguez v. Google: Notice Plan

EXTERNAL Email

Thanks, Argemira.

From: Flórez, Argemira <AFlorez@willkie.com>

Sent: Monday, April 22, 2024 2:41 PM

To: Ryan Sila <RSila@susmangodfrey.com>; Santacana, Eduardo E. <ESantacana@willkie.com>

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>; WAAGOOGLTEAM@lists.susmangodfrey.com

Subject: RE: Rodriguez v. Google: Notice Plan

EXTERNAL Email

Counsel –

As we previewed for you on our call earlier today, in circumstances where Google must send legal notices to Google Workspace for Education suite accounts, a type of Enterprise account, it does so through the administrator and does not send notices directly to the end user. We plan to send class notice to these accounts consistent with this practice.

Thank you,
Argemira

Argemira Flórez

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NEW | Please note our new office address, effective December 15, 2023

From: Ryan Sila <RSila@susmangodfrey.com>

Sent: Monday, April 22, 2024 12:36 PM

To: Flórez, Argemira <AFlorez@willkie.com>; Santacana, Eduardo E. <ESantacana@willkie.com>

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>; WAAGOOGLTEAM@lists.susmangodfrey.com

Subject: RE: Rodriguez v. Google: Notice Plan

*** **EXTERNAL EMAIL** ***

Great, I'll send an invite.

From: Flórez, Argemira <AFlorez@willkie.com>

Sent: Monday, April 22, 2024 10:26 AM

To: Ryan Sila <RSila@susmangodfrey.com>; Santacana, Eduardo E. <ESantacana@willkie.com>

Cc: FIREBASE-WFGE <FIREBASE-WFGE@willkie.com>; WAAGOOGLTEAM@lists.susmangodfrey.com

Subject: RE: Rodriguez v. Google: Notice Plan

EXTERNAL Email